

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:14-cr-367 JAR (TCM)
)	
ABSALOM CARLISLE,)	
)	
Defendant.)	

THIRD MOTION TO TRAVEL

COMES NOW Defendant, Absalom Carlisle, by and through counsel, and hereby moves this Court for permission to travel from Sewanee, Tennessee to Birmingham, Alabama on Monday, March 14, 2016, to return on Monday 21, 2016. In support of this motion, Defendant states as follows:

1. Defendant's wife currently resides in Birmingham, Alabama.
2. Recently, Defendant's wife underwent shoulder surgery.
3. As a result of the surgery, Defendant's wife cannot perform all basic household or personal care duties without assistance.
4. Accordingly, Defendant files the instant motion to travel to Birmingham, Alabama so he can assist his wife with daily needs while she recuperates over the next week.
5. If permitted to travel, Defendant will reside with his wife at her address in Birmingham, Alabama.
6. If permitted to travel, Defendant will contact his pretrial services officer as directed.
7. Defendant, through counsel, has discussed this matter with assistant United

States attorney Reginald Harris. Mr. Harris does not object to Defendant's request.

8. Defendant, through counsel, attempted to discuss this matter with pretrial services officer Lauren Gilkerson. However, Ms. Gilkerson was not available for comment.

WHEREFORE, Defendant respectfully requests this Honorable Court permit him to travel from Sewanee, Tennessee to Birmingham, Alabama on Monday, March 14, 2016, to return on Monday 21, 2016.

Respectfully submitted,
ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Reginald Harris, assistant United States attorney.